UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

CHRISTOPHER KOHLS and, MARY FRANSON

Case No. 24-cv-03754 (ECT/DLM)

Plaintiffs,

VS.

STIPULATION FOR AN EXTENSION OF TIME TO RESPOND TO COMPLAINT

KEITH ELLISON, in his official capacity as Attorney General of Minnesota, and CHAD LARSON, in his official capacity as County Attorney of Douglas County,

Defendants.

Upon stipulation of the parties, Defendant Keith Ellison, in his official capacity as Attorney General of the State of Minnesota (Attorney General) and Chad Larson, in his official capacity as County Attorney of Douglas County (Douglas County Attorney), requests an extension of time to respond to the Complaint. In support of the stipulation, the parties state as follows:

- 1. Plaintiffs filed this action on September 27, 2024, naming the Attorney General and the Douglas County Attorney as Defendants. (ECF No. 1.) Plaintiffs served the Summons and Complaint on the Attorney General on September 30, 2024; they served the Douglas County Attorney the same day. (ECF No. 8.)
 - 2. The defendants' deadline to respond to the Complaint is October 21, 2024.
- 3. On October 11, 2024, Plaintiffs moved for a preliminary injunction. (ECF No. 11). Defendants' deadline to respond to the motion is November 1, 2024; Plaintiffs' reply deadline is November 15, 2024; and the hearing will be held on November 25, 2024.

4. To conserve the resources of the parties and the Court, the parties agree that the deadline for the defendants to answer or otherwise respond to the Complaint should be extended until 21 days after a ruling from the Court on the motion for a preliminary injunction.

WHEREFORE, the parties respectfully request that the Court enter an Order pursuant to Fed. R. Civ. P. 6(b) granting the Attorney General and the Douglas County Attorney an extension of the deadline to answer or otherwise respond to the complaint until 21 days after a ruling from the Court on the motion for a preliminary injunction.

Dated: October 17, 2024 UPPER MIDWEST LAW CENTER

s/M. Frank Bednarz

Douglas P. Seaton (#127759) James V. F. Dickey (#393613) Alexandra K. Howell (#0504850) UPPER MIDWEST LAW CENTER

12600 Whitewater Drive, Suite 140 Minnetonka, MN 55343 Voice: 612-428-7000 Email: Doug.Seaton@umlc.org James.Dickey@umlc.org Allie.Howell@umlc.org

M. Frank Bednarz (pro hac vice) HAMILTON LINCOLN LAW INSTITUTE

1440 W. Taylor St. # 1487 Chicago, IL 60607 Voice: 801-706-2690

Email: frank.bednarz@hlli.org

Attorneys for Plaintiffs Christopher Kohls and Mary Franson

Dated: October 17, 2024

KEITH ELLISON State of Minnesota Attorney General

s/Allen Cook Barr

LIZ KRAMER (#0325089) Solicitor General PETER J. FARRELL (#0393071) Deputy Solicitor General ANGELA BEHRENS (#0351076) ALLEN COOK BARR (#0399094) Assistant Attorneys General

445 Minnesota Street, Suite 1400 St. Paul, Minnesota 55101-2131 (651) 757-1010 (Voice) (651) 282-5832 (Fax) liz.kramer@ag.state.mn.us peter.farrell@ag.state.mn.us angela.behrens@ag.state.mn.us allen.barr@ag.state.mn.us

Attorneys for Keith Ellison

Dated: October 17, 2024 SQUIRES, WALDSPURGER & MACE P.A.

s/Kristen C. Nierengarten

Kristin C. Nierengarten, Atty. No. 395224 Zachary J. Cronen, Atty. No. 397420

333 South Seventh Street, Suite 2800 Minneapolis, MN 55402 Phone: (612) 436-4300 Fax: (612) 436-4340

kristin.nierengarten@raswlaw.com zachary.cronen@raswlaw.com

Attorneys For Defendant Chad Larson, in his Official Capacity as County Attorney of Douglas County

|#5913915-v1